1	J. Stephen Peek	
2	(Nevada Bar No. 1758) Erica C. Medley	
3	(Nevada Bar No. 13959) HOLLAND & HART LLP	
4	9555 Hillwood Drive, 2nd Floor	
4	Las Vegas, NV 89134 Tel: 702.669.4600	
5	Fax: 702.669.4650 speek@hollandhart.com	
6		
7	Tariq Mundiya (admitted <i>pro hac vice</i>) Jeffrey B. Korn (admitted <i>pro hac vice</i>)	
8	WILLKIE FARR & GALLAGHER LLP 787 Seventh Avenue	
9	New York, New York 10019	
	(212) 728-8000 tmundiya@willkie.com	
10	jkorn@willkie.com	
11	Michael J. Gottlieb (admitted <i>pro hac vice</i>) WILLKIE FARR & GALLAGHER LLP	
12	1875 K Street, NW	
13	Washington, DC 20006 (202) 303-1000	
14	mgottlieb@willkie.com	
	Attorneys for Plaintiffs	
15	Jysan Holding, LLC; and Jusan Technologies Ltd.	
16		
17	UNITED STATES DISTRICT COURT	
18	D.Y.C.T.D.Y.C.T.	OTATE A DA
19	DISTRICT	OF NEVADA
20	JYSAN HOLDING, LLC, a Nevada Limited	Case No. 2:23-cv-00247-JAD-VCF
	Liability Company; JUSAN	
21	TECHNOLOGIES LTD, an England and Wales Limited Company;	STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO
22	Plaintiff,	MOTION TO DISMISS OR AMEND THE COMPLAINT
23	V.	(Third Request)
24	REPUBLIC OF KAZAKHSTAN, a foreign	
25	sovereign state; THE AGENCY FOR REGULATION AND DEVELOPMENT	ECF No. 30
26	OF THE FINANCIAL MARKET OF THE REPUBLIC OF KAZAKHSTAN, a	
_0	Kazakhstan Government agency; THE	

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1	ANTI-CORRUPTION AGENCY OF THE
	REPUBLIC OF KAZAKHSTAN, a
2	Kazakhstan Government anti-corruption
	agency; THE FINANCIAL MONITORING
3	AGENCY OF THE REPUBLIC OF
	KAZAKHSTAN, a Kazakhstan Governmen
4	agency; THE COMMITTEE FOR
	NATIONAL SECURITY OF
5	KAZAKHSTAN, a Kazakhstan Governmen
	intelligence agency; MADINA
6	ABYLKASSYMOVA, an individual;
	OLZHAS KIZATOV, an individual;
7	ARMAN OMARBEKOV, an individual;
	and ADILBEK DZHAKSYBEKOV, an
8	individual,
- 1	I

Defendants.

Defendants Madina Abylkassymova, Olzhas Kizatov, and Arman Omarbekov (the "Government Official Defendants") filed a Motion to Dismiss the Complaint on April 13, 2023 (ECF No. 23). Pursuant to the Court's Order of May 4, 2023 (ECF No. 28), the current deadline for Plaintiffs Jysan Holding, LLC and Jusan Technologies Ltd ("Plaintiffs") to respond to the Motion to Dismiss is June 5, 2023, and the current deadline for Plaintiffs to amend the complaint as a matter of course is June 5, 2023.

Plaintiffs require additional time to respond to the Motion and consider an amendment to the Complaint in light of the complexity of the issues involved. Plaintiffs and the Government Official Defendants have conferred and reached agreement on an extension of each deadline. This is the third stipulation for extension of time to respond to the Motion and the second stipulation for extension of time to amend the Complaint under Fed. R. Civ. P. 15(a)(1)(B).

IT IS HEREBY STIPULATED AND AGREED that Plaintiffs' time to respond to the Government Official Defendants' Motion to Dismiss or to amend the Complaint pursuant to Federal Rule of Civil Procedure 15(a)(1)(B) is extended to and including **July 5**, 2023.

26 ///

27 28

28

DATED this 31st day of May, 2023.

McNutt Law Firm, P.C.

HOLLAND & HART LLP

/s/ Daniel R. McNutt

Daniel R. McNutt, Bar No. 7815 11441 Allerton Park Drive, #100 Las Vegas, Nevada 89135

Counsel for Defendants Madina Abylkassymova, Olzhas Kizatov, and Arman Ömarbekov

/s/ J. Stephen Peek

J. Stephen Peek, Bar No. 1758 9555 Hillwood Drive, 2nd Floor Las Vegas, NV 89134

Attorneys for Plaintiffs Jysan Holding, LLC; and Jusan Technologies Ltd.

ORDER

IT IS SO ORDERED. Plaintiffs' deadline to respond to the Government Official Defendants' Motion to Dismiss or to amend the complaint is extended to July 5, 2023.

> UNITED STATES DISTRICT JUDGE DATED: June 2, 2023